

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

IN RE: ) CASE NO: 17-46266-659

KIMBERLY G SEEMES ) Chapter 13

) Re: Objection to Claim 9 filed by

) CAVALRY SPV I LLC

) Acct: 7938

) Amount: \$12,086.75

Debtor ) Response Due: February 01, 2018

)

**TRUSTEE'S OBJECTION TO CLAIM 9**

**THIS OBJECTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE OBJECTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE OBJECTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE OBJECTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING, THE DATE OF WHICH WILL BE SENT TO YOU IF YOU FILE A RESPONSE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE OBJECTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.**

COMES NOW Diana S. Daugherty, Standing Chapter 13 Trustee in Bankruptcy, and for her objection to claim states as follows:

The claim of CAVALRY SPV I LLC dated January 09, 2018, should be denied as filed because the creditor has not provided a copy of the writing on which the claim is based nor evidence that the security interest is perfected. The Trustee seeks an order directing her to pay the claim as a general unsecured claim.

WHEREFORE Trustee prays the Court will enter its order sustaining this objection.

Dated: January 11, 2018

/s/ Diana S. Daugherty

Diana S. Daugherty

Standing Chapter 13 Trustee

P.O. Box 430908

St. Louis, MO 63143

(314) 781-8100 Fax: (314) 781-8881

trust33@ch13stl.com

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on January 11, 2018, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on January 11, 2018.

KIMBERLY G SEEMES  
2925 PARK VALLEY DRIVE  
SAINT PETERS, MO 63376

CAVALRY SPV I LLC  
3936 E FORT LOWELL RD #200  
C/O BASS & ASSOCIATES  
TUCSON, AZ 85712

BASS & ASSOC PC  
3936 E FORT LOWELL RD  
STE 200  
TUCSON, AZ 85712

/s/ Diana S. Daugherty  
Diana S. Daugherty, Chapter 13 Trustee